

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10113-DPW
)	
REYLANDO REYES,)	
a/k/a REYLANDO RISE,)	
a/k/a RAYNALDO RISE,)	
a/k/a RAYLANDO RISE,)	
a/k/a RAY RISE,)	
)	
Defendant.)	

**ASSENTED-TO MOTION TO EXCLUDE THE TIME FROM
OCTOBER 20, 2005 THROUGH NOVEMBER 17, 2005,
AND FOR AN ORDER ON EXCLUDABLE DELAY**

The United States hereby moves move, pursuant to 18 U.S.C. §3161(h)(8)(A) and Section 5(c)(1)(A) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, to exclude the time within which trial must commence under 18 U.S.C. §3161(c)(1), excluding from such computation all time, commencing on October 20, 2005 (date of status conference), and concluding on November 17, 2005 (date of initial status conference).

As grounds therefor, the undersigned states that upon motion of former defense counsel, Elliot Weinstein, Esq., the Court appointed new counsel on September 18, 2005 to represent the defendant. On September 19, 2005, Attorney Stylianus Sinnis of the Federal Defender Office filed his notice of appearance. A conference was held this day, at which Attorney Sinnis advised the Court that he needed an additional four weeks to review the

case file and discovery materials, and to confer with the defendant and former defense counsel. The Court has granted counsel's request and has scheduled an initial status conference for November 17, 2005 at 2:00 p.m.

Counsel for the defendant, Stylianus Sinnis, Esq., has given his assent to this motion.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice are served by granting the requested exclusion, and that said exclusion outweighs the best interest of the public and the defendants in a speedy trial, and, accordingly, exclude all time, **commencing on October 20, 2005, and concluding on November 17, 2005**, in computing the time within which trial must commence under 18 U.S.C. §3161, and request that the Court enter an Order of Excludable Delay.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
(617) 748-3103

Date: October 20, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
October 20, 2005

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, do hereby certify that I have this day served by electronic court filing a copy of the foregoing to Stylianus Sinnis, Esq., Federal Defender Office, 408 Atlantic Avenue, 3rd Floor, Boston, MA 02110.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY